



**Consumers
Power
Company**

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September 20, 1984

James G Keppler, Administrator
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - RESPONSE TO IE INSPECTION REPORT 84-14

Noncompliance (50-255/84-14-01)

Technical Specification 6.8.1.a, by reference through Appendix A of Regulatory Guide 1.33, requires implementation of procedures for nuclear startup. Plant procedure T-95, "Initial Approach to Critical for a New Palisades Core" provides for establishment of an initial PCS boron concentration (Step 3.3) and a prerequisite (Step 3.4) stating "No dilution is occurring". Dilution is commenced at Step 5.10 after all control rods are withdrawn (Steps 5.1 through 5.6) and specified verifications are completed.

Contrary to the above, on July 24, 1984 the licensee performed three PCS dilutions which reduced the boron concentration from 1410 ppm (established at Step 3.3) to 1357 ppm, while performing procedure T-95 but before reaching Step 5.10 for commencing dilution.

Corrective Action Taken and Results Achieved

Procedure T-95, "Initial Approach to Critical for a New Palisades Core", was revised to include a caution statement in the body of the procedure which reemphasizes the requirement that primary coolant system dilutions are not permitted until all control rods have been withdrawn. Additionally, operations personnel were briefed regarding the requirements of the test procedure prior to subsequent implementation.

Corrective Action to be Taken to Avoid Further Noncompliance

None

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Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Noncompliance (50-255/84-14-02)

Title 10, Code of Federal Regulations, Part 50.54(q) requires operating power reactor licensees to follow their NRC-approved emergency plans. Palisades Plant Site Emergency Plan, as approved by NRC, specifies at Paragraph 4.1.1 that incidents shall be classified as an Unusual Event with initiating conditions listed in Table 4.2. Table 4.2, in turn, lists "primary coolant system leakage in excess of Technical Specifications, but less than 50 gpm" and "critical operations at PCS temperature less than 525°F" as Unusual Events.

Contrary to the above, when primary coolant system leakage exceeded Technical Specifications (1.0 gpm unidentified) on July 25 and again on July 27, the licensee delayed classification about seven hours (July 25) or did not classify (July 27) these circumstances as Unusual Events.

Also contrary to the above, with the reactor critical at PCS temperature less than 525°F at 5:44 p.m. on July 28, 1984, the licensee did not classify as an Unusual Event until 7:09 p.m.

As a direct consequence, immediate (within one hour) notifications of these events to NRC and others were not completed in a timely fashion as envisioned under 10 CFR 50.72.

Corrective Action Taken and Results Achieved

Classification of the emergency and completion of the appropriate notifications are the responsibilities of the Site Emergency Director (SED). The Shift Supervisor has subsequently been relieved of the responsibilities of the SED, with the SED function now being fulfilled by the Shift Engineer. The change in assignment of the SED function alleviates the conflicting priorities with which the Shift Supervisor was formerly confronted; namely, the timely implementation of the Site Emergency Plan as the SED, versus the direction of control room activities in response to the emergency. In addition to fulfilling the SED function, the Shift Engineer will continue to be responsible for providing the accident/transient analysis as required by NUREG-0737.

The above described change will facilitate the timely implementation of all aspects of the Site Emergency Plan.

JGKeppler, Administrator
Palisades Plant
RESPONSE TO IEIR 84-14
September 20, 1984

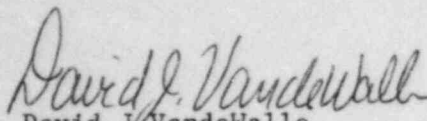
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Corrective Actions to be Taken to Avoid Further Noncompliance

None

Date When Full Compliance Will be Achieved

Full compliance has been achieved.


David J. Vandewalle
Director, Nuclear Licensing

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector - Palisades